

Operational Services

Administrative Procedure - Targeted School Violence Prevention Program

Use this procedure to establish a Targeted School Violence Prevention Program (Program). It defines terms important to the Program, outlines actions for specific staff members to execute, and is adapted from the premier best practice model as of this publication: *Threat Assessment in Virginia Public Schools: Model Policies, Procedures, and Guidelines*, Fifth Edition (July 2023), Virginia Center for School and Campus Safety, Virginia Dept. of Criminal Justice Services, at: www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12_threat_assessment_management_mppg_mpd.pdf www.dcjs.virginia.gov/sites/dcjs.virginia.gov/files/k-12_threat_assessment_management_mppg-dec2022_mpd.pdf.

This administrative procedure contains three sections as follows:

1. Glossary of Terms
2. Establishment and Function of Targeted School Violence Prevention Plan
3. Preparedness for a Targeted School Violence Crisis, Response, and Recovery

Glossary of Terms

Aberrant Behavior – Behavior that is atypical for the person or situation and causes concern for the safety or well-being of those involved. Aberrant behavior involves actions, statements, communications, or responses that are unusual for the person or situation; actions that could lead to violence toward self or others; or actions that are reasonably perceived as threatening or causing concern for the well-being of the person. These can include (but are not limited to):

- Unusual withdrawal or isolation of subjects from peers and family members;
- Sullen or depressed behavior from an otherwise friendly and positive person;
- Atypical or out-of-context outbursts of verbal or physical aggression;
- Increased levels of agitation, frustration, or anger;
- Confrontational, accusatory, or blaming behavior;
- An atypical interest in or fascination with weapons or acts of violence; and/or
- Fixation on violence as a means of addressing a grievance.

District Environment – Broadly characterized as the District’s learning and working environment; it includes the physical environment of school buildings and grounds, all services and programs provided by the District, and the overall school climate.

Pose a Threat – To pose a threat means an individual has, or is in the process of obtaining, the intent and capability to cause harm to self or others through planning and preparation.

Protective Factors – Characteristics or resources that make it less likely that an individual will engage in violence.

Risk Factors – Characteristics that make it more likely that an individual may engage in violence. Risk factors are usually stable over time.

School Climate – A part of the District environment, school climate is the quality and character of school life. School climate is based on patterns of students’, parents’/guardians’, and school personnel’s

experience of school life; it also reflects norms, goals, values, interpersonal relationships, teaching and learning practices, and organizational structures. ¹

Targeted School Violence – Includes school shootings and other school-based attacks where a school or a member of the school community was deliberately selected as the target of the attack and was not simply a random target of opportunity.

Targeted School Violence Prevention Plan (TSVP Plan) – For purposes of policy 4:190, *Targeted School Violence Prevention Program*, and this procedure, a District-wide plan that is incorporated into each School Emergency Operations and Crisis Response Plan (SEOCR) in 4:170-AP1, *Comprehensive Safety and Security Plan*. A TSVP Plan is collectively implemented by local school officials, District staff, students, families, and the community with the goal of preventing and identifying threats and targeted school violence. Under a properly implemented TSVP Plan, schools can respond to individuals/situations that raise safety concerns.

Threat – A concerning communication or behavior that indicates that an individual may pose a danger to the safety of school staff or students through acts of violence or other behavior that could cause harm to self or others. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; it is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by or communicated to a third party, and regardless of whether the target of the threat is aware of the threat. For more information on types of threats, see the subheads **Glossary of Terms** and **Assessing and Classifying Threats** in 4:190-AP2, *Threat Assessment Team (TAT)*.

Threat Assessment – A systematic, fact-based process emphasizing an appraisal of observed (or reasonably observable) behaviors to identify potentially disruptive, dangerous, or violent situations, to assess them, and to manage/address them.

Threat Assessment Team (TAT) – A multidisciplinary Building-level team lead by the Building Principal to perform specific threat assessments. For information about TAT members, the function of TATs, and their procedures, see 4:190-AP2, *Threat Assessment Team (TAT)*.

Warning Signs – Characteristics or behaviors that are associated with a current or escalating risk of violence. These tend to be dynamic, acute, and often associated with new stresses, events, losses, or failures.

Establishment and Function of Targeted School Violence Prevention Plan

Following are the strategic procedures to integrate a TSVP Plan into the District’s existing policies and procedures.

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| Superintendent | Selects School Violence Prevention Team (SVP Team) members from throughout the community to include: Building Principals (Building Principals are mandatory for successful implementation of a TSVP Plan). |

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¹ Definition adapted from the National School Climate Center. See www.schoolclimate.org/about/our-approach/what-is-school-climate.

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| | <p>District Safety Coordinator (see 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities</i>)</p> <p>Teachers</p> <p>Law enforcement representatives</p> <p>Board Attorney ²</p> <p>District psychologist(s), social worker(s), and/or counselor(s)</p> <p>Other mental health workers and/or social service agencies</p> <p>Faith leaders</p> <p>Community members</p> <p>Students</p> <p>Chairs and convenes SVP Team meetings for the purpose of developing a TSVP Plan.</p> <p>Determines whether to recommend that the Board assess the District’s conditions for development and learning (see 7:180-AP1, <i>Prevention, Identification, Investigation, and Response to Bullying</i>, for resources and more discussion).</p> <p>Informs the Board of the SVP Team’s progress, needs, and recommendations by adding information items to the Board’s agendas as needed. ³</p> <p>Prior to the start of each school year, files 4:190-AP2, <i>Threat Assessment Team (TAT)</i>, and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center, as applicable. 105 ILCS 128/45(b), amended by P.A.s 102-791 and 103-175. Informs the Board that this filing was completed.</p> |
| SVP Team | Meets when called by the Superintendent for the purpose of: (1) developing a TSVP Plan, and (2) creating, implementing, and monitoring TATs. |

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² Consult the board attorney about creating methods for exchanging information in a manner that complies with applicable State and federal laws. See f/n 4 below.

³ See sample policy 2:240, *Board Policy Development*. Resources may include providing resources to and access for staff to professional development opportunities. These opportunities should train staff to properly respond to students who provide them with information about a threat or school safety concern. See *Prior Knowledge of Potential School-Based Violence: Information students learn may prevent a targeted attack*, U.S. Secret Service and U.S. Dept. of Education, p. 10, at: https://rems.ed.gov/docs/ED_BystanderStudy.pdf.

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| SVP Team, cont'd | <p>For more information about the function of TATs, see 4:190-AP2, <i>Threat Assessment Team (TAT)</i>. See Recommendation #1 from the <i>Recommendations of the Illinois Terrorism Task Force School Safety Working Group</i>, encouraging districts to establish TATs, at: www.iasb.com/IASB/media/School-Safety/ITTFSchoolSafetyRecommendations.pdf.</p> <p>Ensures that the District’s TSVP Plan complies with applicable civil rights statutes and other State and federal laws.</p> <p>Ensures that all District staff are annually trained⁴ and understand the TSVP Plan, the role of the SVP Team, and the role a TAT.</p> <p>Ensures that procedures are maintained for effective information sharing between the District and local law enforcement agencies and community services agencies, including defining the threshold for law enforcement intervention.</p> <p>Regularly assesses the effectiveness of the TSVP Plan throughout the District, including the establishment of resources for central reporting mechanisms at the District-wide and school-building level.</p> <p>Identifies Board policies and procedures or equivalent topics that possibly affect a TSVP Plan, including but not limited to:</p> <ul style="list-style-type: none"> 1:20, <i>District Organization, Operations, and Cooperative Agreements</i> 2:150, <i>Committees</i> 2:240, <i>Board Policy Development</i> 2:270, <i>Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited</i> 3:40, <i>Superintendent</i> 3:60, <i>Administrative Responsibility of the Building Principal</i> 4:165, <i>Awareness and Prevention of Child Sexual Abuse and Grooming Behaviors</i> 4:170, <i>Safety</i> 4:190, <i>Targeted School Violence Prevention Program</i> |

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⁴ Annual training is not required. Amend the training requirement to reflect local conditions and/or the law at the time of implementation.

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| SVP Team, cont'd | 5:90, <i>Abused and Neglected Child Reporting</i> 5:100, <i>Staff Development Program</i> 5:130, <i>Responsibilities Concerning Internal Information</i> 5:230, <i>Maintaining Student Discipline</i> 6:65, <i>Student Social and Emotional Development</i> 6:120, <i>Education of Children with Disabilities</i> 6:235, <i>Access to Electronic Networks</i> 7:20, <i>Harassment of Students Prohibited</i> 7:130, <i>Student Rights and Responsibilities</i> 7:140, <i>Search and Seizure</i> 7:150, <i>Agency and Law Enforcement Requests/Police Interviews</i> 7:170, <i>Vandalism</i> 7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i> 7:185, <i>Teen Dating Violence Prohibited</i> 7:190, <i>Student Behavior</i> 7:200, <i>Suspension Procedures</i> 7:210, <i>Expulsion Procedures</i> 7:230, <i>Misconduct by Students with Disabilities</i> 7:250, <i>Student Support Services</i> |
| SVP Team, cont'd | 7:340, <i>Student Records</i> ⁵ |

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⁵ Consult the board attorney for guidance about the application of State (Ill. School Student Records Act, 105 ILCS 10/) and federal (Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g) student privacy laws, a crucial element of implementing a successful TSVP Plan, which relies upon school officials sharing confidential information. **Note:** information kept by law enforcement professionals working in a school is not considered a *school student record*. 105 ILCS 10/2. School officials may also need guidance about the release of confidential information given by a student to a therapist, e.g., school counselor or psychologist, but note that those issues are governed by the Mental Health and Developmental Disabilities Confidentiality Act, 740 ILCS 110/.

The following resource from the State of Ill. Campus Security Task Force Report to the Governor, Appendix C, Part II, pp. 227-232³ (2008), at: <https://www2.illinois.gov/ready/sitecollectiondocuments/cstf-report-partii.pdf> <https://ready.illinois.gov/content/dam/soi/en/web/ready/sitecollectiondocuments/cstf-report-partii.pdf>, may be helpful. A multidisciplinary task force comprised of Illinois' top leaders in education, mental health, public safety, and law enforcement created the report in response to the shooting at Northern Ill. University on 2-14-08. While the document addresses many issues pertaining to higher education campus security, it contains helpful information for school officials regarding student privacy and other prevention of targeted school violence management issues.

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| | <p>8:10, <i>Connection with the Community</i></p> <p>8:95, <i>Parental Involvement</i></p> <p>8:100, <i>Relations with Other Organizations and Agencies</i></p> <p>Recommends, through the Superintendent, proposed policy changes to the Board for consideration. See Board policy 2:240, <i>Board Policy Development</i>.</p> <p>Recommends and procures resources for stakeholder training.</p> |
| Building Principal | <p>Ensures 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCR)</i>, is:</p> <p>Available throughout schools (do not limit to office);</p> <p>Distributed to and discussed with local law enforcement; and</p> <p>Regularly reviewed with building staff.</p> <p>Notifies and educates all staff, volunteers, and contractors of their duty to immediately report to the Building Principal or designee any expression of intent to harm another person, concerning communication, or concerning behavior that suggests an individual may intend to commit an act of violence.</p> <p>Notifies and educates staff, parents/guardians, students, and community members: (1) to report individuals and situations of concern to any school administrators or other authorities, i.e., local law enforcement, or the Safe2Help Illinois helpline (www.safe2helpil.com/)⁶, and (2) how school officials will address these concerns.</p> <p>Distributes Board policy 4:190, <i>Targeted School Violence Prevention Program</i>; 4:190-AP2, E6, <i>Targeted School Violence Prevention and Threat Assessment Education</i>; and 7:180-AP1, E2, <i>Be a Hero by Reporting Bullying</i>; and discusses what TATs</p> |

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An additional resource that may be helpful is *School Resource Officers, School Law Enforcement Units, and the Family Educational Rights and Privacy Act (FERPA)*, from the Privacy Technical Assistance Center of the U.S. Department of Education (2019), at: <https://studentprivacy.ed.gov/resources/school-resource-officers-school-law-enforcement-units-and-ferpa>. Disclosure of confidential student records to threat assessment team members is addressed on p. 12-14.

⁶ Research published by the American Academy of Pediatrics finds that firearm anonymous reporting systems in schools save lives. See French et al., *Firearm-Related Tips in a Statewide School Anonymous Reporting System*, Pediatrics, Volume 153, Issue 2 (published February 2024). Safe2Help Illinois is a confidential tipline that encourages, but does not require, reporters to provide their name and contact information. See www.safe2helpil.com/about-us/school-faq/.

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| | <p>are and what they do when they learn of threats and/or school violence.⁷</p> <p>Assesses the feasibility of forming a local anonymous tip line and organizing its management. Any locally operated school violence helpline must work in conjunction with Safe2Help Illinois as needed. 5 ILCS 860/10(d), added by P.A. 102-752.</p> <p>When a tip or concern is raised, ensures TATs are trained to engage in their work. See 4:190-AP2, <i>Threat Assessment Team (TAT)</i>.</p> |
| All District staff, volunteers, and contractors | <p>Read 4:190-AP2, E6, <i>Targeted School Violence Prevention and Threat Assessment Education</i>.</p> <p>Immediately report to the Building Principal or designee any expression of intent to harm another person, concerning communication, or concerning behavior that suggests an individual may intend to commit an act of targeted violence.</p> <p>Upon belief that an individual/situation poses a clear and immediate threat of serious violence that requires containment, notify school security and/or law enforcement in accordance with the SEOCR. See 4:170-AP1, <i>Comprehensive Safety and Security Plan</i>.</p> |
| School Board | <p>Monitors 4:190, <i>Targeted School Violence Prevention Program</i>, and considers adopting changes recommended by the SVP Team. See Board policy 2:240, <i>Board Policy Development</i>.</p> <p>Ensures that prior to the start of each school year, the Superintendent files 4:190-AP2, <i>Threat Assessment Team (TAT)</i>, and a list identifying the members of all TATs with: (1) a local law enforcement agency, and (2) the Regional Office of Education or Intermediate Service Center. 105 ILCS 128/45(b), amended by P.A. s-102-791 and 103-175.</p> |

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⁷ Creating a school climate in which students believe the school staff wants to hear from them about threats is critical to ensuring that students come forward. Encourage students to come forward regardless of the amount of information they have, and convey to students that their reports are taken seriously. Also communicate to students that their reports may stay anonymous. If students do not feel that they will be treated with respect and listened to in a non-judgmental manner, or that the information will not be protected, they will not come forward and the school will lose an opportunity to intervene in a possible attack, as well as to assist a troubled student. See *Prior Knowledge of Potential School-Based Violence: Information students learn may prevent a targeted attack*, U.S. Secret Service and U.S. Dept. of Education (May 2008), at: rems.ed.gov/docs/DOE_BystanderStudy.pdf https://rems.ed.gov/docs/ED_BystanderStudy.pdf.

For more school climate discussions, see *Guide for Developing High-Quality School Emergency Operations Plans*, U.S. Depts. of Education, Health and Human Services, Homeland Security, Justice, Federal Bureau of Investigation, and Federal Emergency Management Agency (June 2013): rems.ed.gov/docs/REMS_K-12_Guide_508.pdf https://rems.ed.gov/docs/REMS_K-12_Guide_508.pdf; and [sample administrative procedures and related exhibits](#) 7:180-AP1, *Prevention, Identification, Investigation, and Response to Bullying*, 7:180-AP1, E1, *Resource Guide for Bullying Prevention*, 7:180-AP1, E3, *Memo to Staff Regarding Bullying*, and 7:180-AP1, E5, *Report Form for Bullying*.

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| | Provides both the SVP Team and TATs with appropriate resources, which may include providing resources and access for staff professional development opportunities. These opportunities should train staff to properly respond to individuals who provide them with information about a threat or school safety concern. ⁸ |
| Superintendent/Building Principal | Ensures the student behavior policies referred to in student handbooks notify students that threatening behavior could subject a student to disciplinary consequences. See Board policies 2:270, <i>Discrimination and Harassment on the Basis of Race, Color, and National Origin Prohibited</i> , 7:20, <i>Harassment of Students Prohibited</i> , 7:180, <i>Prevention of and Response to Bullying, Intimidation, and Harassment</i> , and 7:190, <i>Student Behavior</i> . Ensures that staff responds to students who provide them with information about a threatening or concerning individual/situation. |

Preparedness for a Targeted School Violence Crisis, Response, and Recovery

Following is an extension of 4:170-AP1, *Comprehensive Safety and Security Plan*. It outlines additional tasks for the Superintendent, District Safety Coordinator, and Building Principal(s) preparing for a targeted school violence crisis that school officials can incorporate into training related to each existing SEOCR.

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| Superintendent, Building Principal, and SVP Team | Examine 4:170-AP1, <i>Comprehensive Safety and Security Plan</i> , and recommend any changes to existing procedures to the Superintendent or District Safety Coordinator. |
| District Safety Coordinator | Meets with SVP Team to foster an understanding of what additional items each 4:170-AP1 Safety Team (see 4:170-AP1, <i>Comprehensive Safety and Security Plan, Part C, District Safety Coordinator and Safety Team; Responsibilities</i>) might add to its procedures to accomplish a response and recovery. Adds an agenda item to the 4:170-AP1 Safety Team meetings specific to Targeted School Violence; considers inviting the Board Attorney and local law enforcement and emergency responders to this meeting. Note: During a crisis, legal counsel will be a crucial part of crisis response and management (but not necessarily public relations and communication) because school officials must make split-second decisions, often with legal consequences to the District. Local law |

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⁸ See *Prior Knowledge of Potential School-Based Violence: Information students learn may prevent a targeted attack*, p. 10, at: rems.ed.gov/docs/DOE_BystanderStudy.pdf https://rems.ed.gov/docs/ED_BystanderStudy.pdf.

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| | <p>enforcement’s familiarity with the identity of the District’s legal counsel <i>before</i> a crisis occurs will assist with a faster connection between legal counsel and the school officials involved in the early stages of a Targeted School Violence Crisis and the immediate response to it.</p> <p>Considers designating a trained public relations and communication manager to inform parents/guardians and the community during a crisis and to keep pace with social media information.</p> |
| <p>Superintendent and Building Principal(s)</p> | <p>For crisis preparedness and response, ensure that:</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part G, School Emergency Operations and Crisis Response Plan (SEOCR)</i>, reflects each individual building’s needs.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Part F, School Safety Drill Plan</i>, supports a TSVP Plan.</p> <p>4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts G and H</i>, reflects each building’s needs. Also ensure that multiple copies of these plans exist, and direct that appropriate persons have access to the plans, e.g., local law enforcement authorities, etc. One copy in the Building Principal’s office is insufficient.</p> <p>For crisis recovery, ensure that 4:170-AP1, <i>Comprehensive Safety and Security Plan, Parts I, J, and K</i>, reflects District needs and that the Board Attorney is aware of the plans.</p> <p>Recommend to the District Safety Coordinator any other additional crisis recovery items that the 4:170-AP1 Safety Team deems necessary.</p> |